

AB:JGH

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

TYRELLE NEWELL,

Defendant.

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COMPLAINT AND AFFIDAVIT
IN SUPPORT OF
APPLICATION FOR AN
ARREST WARRANT

(T. 18, U.S.C., § 922(g)(1))

18 M 1064

EASTERN DISTRICT OF NEW YORK, SS:

SIMON LAINE, being duly sworn deposes and states that he is a Detective with the New York City Police Department (“NYPD”), duly appointed according to law and acting as such.

Upon information and belief, on or about October 31, 2018, within the Eastern District of New York, the defendant TYRELLE NEWELL, having been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly and intentionally possess in and affecting interstate and foreign commerce a firearm, to wit: a 38 caliber Smith and Wesson revolver and ammunition.

(Title 18, United States Code, Section 922(g)(1))

The source of your deponent’s information and grounds for his belief are as follows:¹

¹ Because this affidavit is being submitted for the limited purpose of establishing probable cause to arrest, I have not set forth each and every fact I have learned during the course of this investigation.

1. I am a Detective with the NYPD and have been involved in the investigation of numerous cases involving firearms offenses. I am currently assigned to the Firearms Investigation Unit and am a member of the Eastern District of New York Triggerlock Program. I am familiar with the facts and circumstances set forth below from my personal involvement in this investigation, my review of documents, records and reports, and from reports made to me by other law enforcement officers and personnel. Where I describe the statements of others, I am doing so only in sum and substance and in part.

2. On or about October 31, 2018, members of the New York Parole Division conducted a search of the defendant TYRELLE NEWELL's residence on West 35th Street in Brooklyn, New York. During the search, a parole officer recovered a loaded .38 caliber Smith and Wesson revolver (the "Revolver") from a jacket inside NEWELL's closet. Parole officers also recovered various forms of identification belonging to NEWELL inside his residence. Members of the New York City Police Department then arrested NEWELL, who was charged with, among other things, Criminal Possession of a Weapon in the Second Degree (possession of a loaded firearm), in violation of New York Penal Law Section 265.03(3), a felony.

3. Based on my discussions with an interstate nexus expert from the Bureau of Alcohol, Tobacco, Firearms and Explosives, I know that the Revolver was manufactured outside the State of New York.

4. I have reviewed the defendant TYRELLE NEWELL's criminal history records and have determined that, on or about May 12, 2016, NEWELL was convicted in Kings County Supreme Court of Attempted Criminal Possession of a Weapon in the Second

Degree, in violation of New York Penal Law Section 265.03, a class D felony and a crime punishable by a term of imprisonment of more than year.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant TYRELLE NEWELL so that he may be dealt with according to law.



DET. SIMON LAINE
New York City Police Department

Sworn to before me this
6th day of November 2018

THE HONORABLE ROANNE L. MANN
CHIEF UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK